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I. PURPOSE

ND Packaging’s goal is to prevent injuries to all persons on its property. The purpose of this policy is to communicate ND Packaging’s safety expectations to contractors working on its premises. The contractor has the responsibility and authority to develop, implement and administer environmental, health and safety processes as required by this policy.

II. SCOPE

This Contractor Policy applies to all contractors, subcontractors, and vendors that provide services or perform construction, servicing, or maintenance activities at ND Packing property. Contractors retain primary responsibility for the safety of their worksites, employees, and the safety of any ND Packaging employee they may encounter. Contractors are accountable for regulatory compliance, implementing effective safety programs, adequate training, and adherence to all reporting requirements.

Contractors must coordinate all work with their project manager, which is defined as their main point of contact for the work being performed on NDP property.

III. DEFINITIONS

Contractor – Any person or entity, other than an ND Packaging employee, who performs work at an ND Packaging facility. This includes construction teams or crews, chemical suppliers, equipment installers, consultants, advisors, service providers, etc. *Contractor* may refer to the company or the employees of the contracting company.

Driver – anyone who delivers or receives materials for transport (raw materials, supplies, packages, finished products, etc.).

ND Packaging Project Manager – The ND Packaging employee who is designated by ND Packaging to act as a liaison and ND Packaging’s point of contact for the Contractor’s safety and work performance.

Subcontractor – a company or individual who was hired by a Contractor who performs any part of the work or services the Contractor was hired by ND Packaging to complete on ND Packaging premises.

Vendor – a company or individual who provides on-site services but who may only perform limited hands-on work. Examples include those who provide uniforms, package or mail delivery, concessions, etc. Depending on the type and amount of services performed, these may be excluded from the pre-qualification requirements of this policy. However, all vendors and visitors are expected to abide by all ND Packaging safety rules. Decisions as to whether the pre-qualification requirements apply to these vendors will be solely in the discretion of the EHS Manager for each location.

Visitor – an individual (or group of individuals) who is on ND Packaging premises for only a short amount of time and who does not perform “hands-on” work, for example tours or conducting inspections. Examples of hands-on work include, but are not limited to, using tools, entering a confined space and locking out equipment. Visitors must always be escorted by an ND Packaging employee including both entering and exiting the ND Packaging facility. All visitors must be wearing proper Personal Protective Equipment.

IV. RESPONSIBILITIES

EHS Manager is responsible for the following:

- Reviewing this Contractor Policy annually and make any applicable changes
- Reviewing Contractor's EHS requirements with the Project Manager. Depending on the tasks to be conducted, the contractor may have additional training requirements.
- Participating in the Pre-Job Safety Meeting (PJSM)
- Maintaining contractor EHS-related documentation

Project Managers are responsible for the following:

- Managing contractors based on this policy
- Ensuring contractors have received proper training prior to conducting work at ND Packaging
- Scheduling PJSM
- Overseeing contractor jobs on-site

All ND Packaging Team Members are responsible for the following:

- Ensuring any identified contractor violations are reported

Contractors are responsible for the following:

- Completing the contractor safety orientation and submitting required documentation
- Submitting proof of additional training as required
- Complying with this Contractor Policy

V. PROCESS**A. Pre-Approval**

Prior to the commencement of work by a Contractor at an ND Packaging facility, a Contractor must be able to demonstrate that it has an acceptable Environmental, Health and Safety Program and obtain ND Packaging's approval. Annually, every contractor and subcontractor must submit documentation for approval, including:

- The OSHA 300 log and their insurance Experience Modification Rate (EMR)
- EHS-related programs specific to the work they will perform; for example, Lockout/Tagout or Confined Space Entry (EHS Manager will specify provide guidance)
- The Contractor Safety and Health Policy.
- Documentation, proof of training, certifications to confirm that its employees, subcontractors, suppliers, workers, and other persons performing services or work in connection with the Contract:
 - have the requisite skill and knowledge necessary to perform such services or work;
 - have received the required training and have passed appropriate testing; and
 - are, as required, fully certified to perform the respective job.
- Certification of all insurance as required in the ND Packaging Terms and Conditions, as agreed between the parties. Minimum insurance requirements are defined in the ND Packaging Purchase Order Terms and Conditions. Additional coverage may be required depending on the type of work being performed by the contractor.

If a Contractor fails to submit this documentation as required, ND Packaging will provide notice to the non-Compliant Contractor, and the Contractor (or any subcontractor) will not be permitted to work on the premises until ND Packaging, in its sole discretion, is satisfied that the Contractor complies with these requirements.

B. Orientation

Every Contractor and Subcontractor employee who will be performing work or services at ND Packaging must complete the required EHS orientation before starting their work on site. This EHS orientation is not intended to meet OSHA regulations but rather constitutes review of the site expectations and site-specific requirements. The contractor and the ND Packaging Project Manager will work with the EHS Manager to schedule the orientation. This orientation must be completed every twelve (12) months to maintain access ND Packaging. The EHS Manager will maintain documentation of completed contractor employee orientations.

C. Pre-Job Safety Meetings

The Project Manager must schedule a [Pre-Job Safety Meeting](#) (PJSM) with the EHS Manager, the area manager, the Maintenance Manager (if required), and the contractor representative(s), recommended at least two days prior to scheduled work.

During the PJSM, EHS will determine if additional training is required based on the tasks to be conducted. For example, if the contractor must use an aerial lift, the operators must submit documentation for aerial lift and fall protection training.

The contractor representative(s) must ensure that all contractor workers involved in the job receive all the information from the PJSM form and sign it if they did not attend the meeting. The completed and signed PJSM form must be posted near the contractor work area. When the job is complete, this form must be submitted to EHS.

D. Contractor Safety Representatives

For all projects, a designated project safety representative or project safety manager shall always be on site while work is being performed. Contractors with less than 25 employees on-site can designate a representative to act as Safety Coordinator.

Contractors with 25 or more employees require the Safety Coordinator be full-time and dedicated to safety (as opposed to a site supervisor). Safety Coordinators must possess a minimum of 30-hour OSHA Outreach Training card (construction or industry) and 5 years of professional safety experience, or an equivalent credential such as an external safety certification (Certified Safety Professional) or relevant collegiate coursework.

Projects with 100 or more employees will be reviewed by the ND Packaging Project Manager and Safety Department on a case-by-case basis to determine how many Safety Coordinators are required.

E. Project Communication

At ND Packaging's request, the General Contractor/Construction Manager may be required to participate in various meetings with representatives of the larger NDP community or other interested parties to address issues. Any such meetings will be led by the ND Packaging Project Manager and may also involve other affiliated NDP departments. At such meetings, the General Contractor/Construction Manager may be asked to respond to safety and operational issues that arise on projects and may be expected to (1) provide brief descriptions of their planned work; and (2) provide other information as may be appropriate to the project.

F. Project-Specific Safety Plan Overview

General Contractors/construction managers must develop, communicate, and implement a written project-specific safety plan ("Plan") in cooperation with ND Packaging Project and EHS Managers.

The goal of the Plan is to assist general Contractors/construction managers in meeting their responsibilities to provide a safe work environment and to aid in developing a program to eliminate accidents, injuries, and property damage. Although the specific elements of each Plan will vary by the work or services to be provided and project size, complexity, and location, at a minimum, the Plan must adequately address the requirements of this policy and all hazardous task types and their required controls. Examples of hazardous tasks: crane/rigging, electrical, chemical handling, work at heights, hot work, confined space entry, powered industrial vehicles, excavations, etc. Examples of controls for hazardous work: communication, training, housekeeping, assessments and permits, incident reporting, PPE, signs and barricades, emergency action procedure, cell phone policy etc.

The Plan must also identify foreseeable project-specific hazards and list the general Contractor's/construction manager's mitigation and control of such hazards. In addition, the Plan must include an audit/inspection plan that will be exercised by both the Contractor and ND Packaging representatives. As the Plan is meant to be a living document, general Contractors/construction managers are to amend the Plan to address any new hazards that were not addressed in the initial Plan but are later identified while performing work at the NDP.

This Plan is required to be followed by all contractors and subcontractors.

G. Conducting Work

At all times during the performance of work, Contractors and subcontractors shall keep the site neat, clean and free of accumulation of waste materials and trash.

Contractors must adhere to the ND Packaging Personal Protective Equipment (PPE) Policy. Job-specific PPE requirements may also be required based on the location, safety policy or task as identified in the safety reviews or job safety assessments.

Contractors and subcontractors must maintain, and have available for inspection, any required licenses, certifications, or permits for the tasks they are completing. Examples include, crane use, lift truck, hot work and electrical work (MCR entry).

H. Hazardous Materials

Contractors must notify ND Packaging's EHS Manager of any hazardous materials that are intended to be used prior to bringing them on site at ND Packaging. This notification includes the Safety Data Sheet (SDS) and the intended quantity and application. SDSs must be readily available and area personnel (contractor and others) must be protected from these materials during use.

I. Fire Precautions

Except as otherwise specifically provided, the Contractor shall take all necessary precautions to protect the Work from fire, appoint a person at the Site to be responsible for providing and maintaining fire protection equipment at the Site and designating and training the Contractor's employees in firefighting, and comply with any fire safety rules and regulations issued by the Owner's Representative for the Site.

J. Equipment

ND Packaging personnel will not service, modify, or directly wire or connect equipment for Contractors. When Contractor equipment or systems must tie directly into ND Packaging's systems, the linkage will be performed by a combined team of ND Packaging and Contractor representatives. ND Packaging safety equipment cannot be loaned to Contractors (excluding basic forms of Personal Protective Equipment (PPE) such as earplugs and safety glasses). Contractor use of ND Packaging equipment is not permitted without specific approval.

K. Accountability

The Contractors are expected to maintain good order and discipline among its employees and those of its subcontractor(s). The contractor is expected to immediately remove any employee from ND Packaging property who is incompetent, disorderly, intemperate, or who otherwise violates ND Packaging safety rules or who interferes with the property in an unauthorized manner. Serious infractions, including but not limited to issues including lockout, fall protection, confined space and hot work, or purposeful/intentional issues may result in the violator not being permitted on site again.

L. Incident Management

Contractors must report all near miss, property damage and injury/illness incidents to the ND Packaging Project Manager and EHS Manager at the facility as soon as possible upon discovery and in all instances within twenty-four (24) hours of learning of the incident or illness. Written reports are required within 48 hours of learning of the incident or illness. The General Contractor/Construction Manager is responsible for directly notifying any regulatory agencies as required as well as arranging for any necessary follow-up repairs, abatement, or other corrective actions

M. Environmental Compliance

Contractor activities, waste generation, and waste disposal must comply with federal, state, and local requirements. The Contractor must remove all waste materials and rubbish to areas designated by the EHS Manager and must dispose of them as required by law or as directed by the ND Packaging Project Manager. Hazardous or regulated waste disposal generated by the Contractor is the obligation of the Contractor and must be coordinated in conjunction with the EHS Manager. Any deviations require approval of the EHS Manager prior to generating the waste.

N. Long Hair, Clothing and Jewelry

Long hair, including facial hair, must be controlled in a safe manner. At ND Packaging, this means that hair needs to be maintained above shoulder level, out of your eyes and confined to your head (buns, not ponytails). Hair must be contained with no loose strands that could become caught in moving equipment. Wear hair in a style that eliminates an entanglement hazard or use a protective hair net or other head covering to keep hair restrained.

Jewelry, including necklaces, earrings that dangle below the earlobe, watches, bracelets and finger rings, are not allowed in the warehouse or on the production floor at any time. Medical alert necklace can be worn under a shirt or blouse.

Wear clothing that suits your job. Avoid ragged and loose-fitting clothing. Button up shirts and jackets must be buttoned or zipped closed or removed. Loose shirt tails must be tucked in to avoid machine entanglement. Sweatshirts or jackets with hoods and strings are not allowed while working on the production floor. All shirts must have sleeves with a minimum cover beyond armpits.

O. Smoking

ND Packaging is a tobacco-free company. Smoking, vaping, chewing tobacco are prohibited on the property. This includes smoking, vaping or chewing tobacco in personal vehicles on NDP property.

P. Drugs and Alcohol

Contractors must have a Drug and Alcohol Policy. Suspected use, possession, and/or working under the influence of alcoholic beverages or illegal drugs on ND Packaging property must be reported to the Project Manager immediately. ND Packaging reserves the right to inspect baggage, personnel, vehicles, or other personal property, require additional drug and/or alcohol testing and permanently dismiss individuals or companies for violations.

Q. Regulatory Enforcement Activities

Any contractor or subcontractor contacted by OSHA, USEPA, Federal/State/Local Health Departments or law enforcement regarding activities at the ND Packaging facilities must notify the site manager immediately. Any contractor or subcontractor asked by OSHA, USEPA, Federal/State/Local Health Departments or law enforcement to allow access onto ND Packaging property should contact the EHS Manager immediately. ND Packaging is required to be the sole source of tours, inspections or information regarding ND Packaging facilities.

R. Security

The security and safety of the people and ND Packaging property is of utmost importance. Contractors are expected to follow all site security requirements, including badge entry policies, firearms prohibitions, and vehicle use. ND Packaging reserves the right to inspect baggage, personnel, tool boxes, vehicles, or other property as deemed necessary. ND Packaging reserves the right to have security cameras recording footage on its facilities where appropriate. Taking videos, pictures or recording is prohibited unless written permission is obtained from the site General Manager.

VI. VISITOR REQUIREMENTS

- Visitors must remain escorted by an ND Packaging employee (including both entering and exiting the site).
- All Visitors must comply with all relevant Health, Safety and Environmental rules, including ALL PPE requirements.
- Visitors must read the Visitor Policy prior entering the production area.
- Visitors must sign the visitors log (both when entering and exiting the facility).
- Visitors are not allowed to carry out "hands-on work" while on ND Packaging premises. To conduct work while at ND Packaging, visitors must complete the site's pre-approval process and EHS orientation.

VII. DRIVER AND VENDOR REQUIREMENTS

Drivers and Vendors must complete the contractor EHS orientation or be escorted by an ND Packaging representative. All Drivers and Vendors must comply with all relevant Environmental, Health and Safety rules, including all PPE requirements.

CONTRACTOR SAFETY POLICY
ND Packaging, Sturtevant, WI

Revision History				
Rev	Date	Made By	Page(s) Affected	Comments
A			All	New Policy
B	08/18/20	Maritza Adams	All	Aligned with the corporate policy and customized to the ND Packaging facility.
C	8/27/20	Maritza Adams	V. L. Incident Mgmt.	24 hours from learning of incident to report it verbally and 48 from learning of incident to provide written report
C	8/27/20	Maritza Adams	V. O. Smoking	Included vaping and chewing tobacco as being prohibited
D	9/23/20	Maritza Adams	Page 2	Added table of contents
D	9/23/20	Maritza Adams	V. Process, page 6	Added section on Hair, Clothing and Jewelry
E	11/10/20	Maritza Adams	All	Updated company logo